UNITED STEES ENVIRONMENTAL PROTECTION ENCY

DATE:

SUBJECT: PP#0F2277; Naphthalene cetic acid in apples, pears and olives.

FROM: William Dykstra

Toxicology Branch, HED (TS-769)

WMD 5/9/30

To Robert Taylor, PM#25

Registration Division (TS-767)

&

Residue Chemistry Branch (TS-769)

Recommendations:

In memo of 4/16/80, Alfred Smith of RCB concludes that ethyl ester of naphthaleneacetic acid would result in NAA. Toxicology Branch concludes that this problem is resolved for the ethyl ester of NAA. In addition, since no new tolerances are being added to 40 CFR 180.155, the requested tolerances in PP#0F2277 can be toxicologically supported by existing toxicity data on NAA and methyl ester of NAA.

The six-month dog study previously requested would be required for any new or additional tolerances. The present provisional ADI is based on a 90-day dog feeding study. This was the most sensitive species for which subchronic or chronic data were available.

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